



ENZYMATIC THERAPY INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas ♦ PhytoPharmica
Tyler Encapsulations ♦ Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 ♦ F: 503.582.0467

**ENZYMATIC THERAPY®
&
PHYTOPHARMICA®**

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 ♦ F: 888.570.6460 (Enzymatic)
P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)

October 22, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

NOV - 1 2004

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

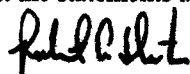
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Osteo Complex	Osteo Complex provides comprehensive support for healthy bone mineralization in a multivitamin and mineral supplement.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (from Poly-Ascorbate™), Vitamin D (as Cholecalciferol), Vitamin E (as d-Alpha-Tocopheryl Succinate), Vitamin K (as Phytonadione), Thiamin (as Thiamin HCl), Riboflavin, Niacin (as Niacinol™), Vitamin B6 (as Pyridoxine HCl), Folic Acid, Vitamin B12 (as Cyanocobalamin), Biotin, Pantothenic Acid (as Calcium Pantothenate), Calcium (as Calcium Citrate, Lysinate, Aspartate, Ascorbate), Magnesium (as Magnesium Lysinate, Glycinate, Aspartate, Citrate, Ascorbate), Zinc (as Zinc Citrate, Ascorbate), Selenium (as a Selenium Aspartate Complex), Copper (as Copper Aspartate, Lysinate, Glycinate), Manganese (as Manganese Citrate), Chromium (from GlucoChrome™), Potassium (as Potassium Ascorbate), Plant Enzymes - Phytase, Betaine HCl, Boron (as Boron Aspartate, Citrate), Silicon (from a Silicon Amino Acid Chelate)

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I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.


By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date 10/22/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,


Michael P. Devereux
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Osteo Complex	Providing magnesium and calcium in a 6:5 ratio, Osteo Complex delivers these and other important minerals, including citrates, as chelated Active Transport Minerals® for optimal absorption.* Vitamin D, boron, vitamin K, manganese, and copper have been added for their key roles in bone mineral metabolism.* Betaine HCl and the plant enzyme phytase are included to promote bioavailability.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (from Poly-Ascorbate™), Vitamin D (as Cholecalciferol), Vitamin E (as d-Alpha-Tocopheryl Succinate), Vitamin K (as Phytónadione), Thiamin (as Thiamin HCl), Riboflavin, Niacin (as Niacinol™), Vitamin B6 (as Pyridoxine HCl), Folic Acid, Vitamin B12 (as Cyanocobalamin), Biotin, Pantothenic Acid (as Calcium Pantothenate), Calcium (as Calcium Citrate, Lysinate, Aspartate, Ascorbate), Magnesium (as Magnesium Lysinate, Glycinate, Aspartate, Citrate, Ascorbate), Zinc (as Zinc Citrate, Ascorbate), Selenium (as a Selenium Aspartate Complex), Copper (as Copper Aspartate, Lysinate, Glycinate), Manganese (as Manganese Citrate), Chromium (from GlucoChrome™), Potassium (as Potassium Ascorbate), Plant Enzymes - Phytase, Betaine HCl, Boron (as Boron Aspartate, Citrate), Silicon (from a Silicon Amino Acid Chelate)

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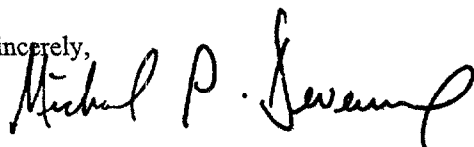
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date 10/23/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer